

EXHIBIT D

[Proposed] Plaintiffs' Leadership Group ("PLG")

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Coordination with JCCP Counsel

The PLG has had ongoing discussions with members of the JCCP Leadership to coordinate proposed MDL leadership but has not reached an agreement. To facilitate coordination with the MDL and the JCCP, the PLG proposes that the following counsel be added to the Proposed Leadership Group.

Brian Abramson as a member of the Plaintiffs' Steering Committee
Williams Hart Boundas

Celine Cutter (JCCP) as Plaintiffs' Liaison Counsel
Cutter Law Group